

WILKINSON) BARKER) KNAUER) LLP

2300 N STREET, NW
SUITE 700
WASHINGTON, DC 20037
TEL 202.783.4141
FAX 202.783.5851
www.wbklaw.com

May 1, 2006

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *Dobson Cellular Systems, Inc.*
E911 Quarterly Report – CC Docket No. 94-102

Dear Ms. Dortch:

Dobson Cellular Systems, Inc. and its subsidiaries, by its attorneys, hereby submit the attached E911 Quarterly Report on their progress toward and compliance with the terms and conditions of the *Order to Stay* and the Commission's E911 rules.¹

If there are any questions regarding this matter, please contact the undersigned.

Sincerely,

WILKINSON BARKER KNAUER, LLP



By: Lawrence J. Movshin
Lee J. Rosen

Attachment

cc: Kris Monteith, Chief, Enforcement Bureau
Catherine W. Seidel, Acting Chief, Wireless Telecommunications Bureau
Tim Ryan, Acting Executive Director, APCO
Rob Martin, Executive Director, NENA
James R. Hobson, Counsel for NENA and NASNA
Steve Marzolf, President, NASNA

¹ See *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, *Order to Stay*, 17 FCC Rcd 14841 (2002).

E911 Status – Quarterly Report

CC Docket No. 94-102

May 1, 2006

Summary of Report

Pursuant to the *Order to Stay* and the Commission's Public Notice dated June 6, 2003,¹ Dobson Cellular Systems, Inc.,² as a Tier II carrier, provides this E911 Quarterly Report ("Report"). The Report provides information on all Phase I and Phase II requests received by DCS, including: the PSAP ID, Name, State, County, Implementation Phase, Air Interface, Date PSAP Request Made, Date PSAP Request Withdrawn, Invalid Request, Deployed, Date Deployed, Date Projected, Reasons and Comment. Detailed information regarding the requests is contained in the attached chart.

Phase I Service

DCS has received numerous requests for Phase I services and has activated service in all but a few of these jurisdictions. Since the last quarterly filing, DCS has received new requests for Phase I service for twelve PSAPs in the following counties: Greene and Cameron, PA; Beckham, Custer; Grady, Kiowa, Ottawa, Roger Mills, and Seminole, OK; and Trumbull County, OH. DCS has worked diligently with its third-party vendor, Intrado, as well as the public safety community, in coordinating Phase I deployment. DCS remains committed to working with its vendors, the PSAPs, and state and local governments, in order to deploy Phase I services in the remaining jurisdictions as soon as possible.

Phase II Service

A. Deployment Preparation

DCS is a mid-sized carrier servicing predominantly rural and suburban markets in eleven states. DCS previously relied primarily upon a TDMA-based network of base stations and switching equipment, but has since completed overlaying its TDMA network with GSM/GPRS technology. DCS has worked with equipment vendors to deploy a network-based Phase II E911 solution, and all switch upgrades necessary to supply Phase II services have been completed. DCS has executed a contract with Andrew Corporation to provide the Position Determining Entity equipment for a hardware solution for E911 Phase II and has also executed a contract with Polaris Wireless to provide a software solution for E911 Phase II.

B. Phase II Requests

During the previous calendar quarter, DCS has deployed the necessary software and hardware of the network-based Phase II solution in response to pending requests. Since the last quarterly filing, DCS received new Phase II requests for twelve PSAPs in the following counties:

¹ See *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, *Order to Stay*, 17 FCC Rcd 14841 (2002) ("*Order to Stay*"); See Public Notice, "Wireless Telecommunications Bureau Standardizes Carrier Reporting on Wireless E911 Implementation," DA 03-1902 (rel. June 6, 2003).

² The instant Report is filed on behalf of Dobson Cellular Systems, Inc. and its subsidiaries (collectively "DCS"). A separate report is being filed for American Cellular Corporation ("ACC"), which is an affiliate of DCS.

Wyoming County, NY; Cameron County, PA; Gentry County, MO; Seminole, Beckham, Custer, Kiowa, Roger Mills, Grady and Ottawa, OK. The status of all requests is detailed in the attachment. To ensure that it may properly prioritize its E911-designated resources, DCS has generally requested each of the requesting PSAPs to provide documentation pursuant to the *Richardson* criteria.³

On June 22, 2005, DCS completed the acquisition of licenses previously held by RFB Cellular, Inc. Debtor-in-Possession and Alpine-Michigan F, LLC Debtor-in-Possession (collectively "RFB").⁴ In the process, DCS became subject to various Phase II E911 deployment requests, all of which RFB had satisfied utilizing a CDMA handset-based technology. Dobson has completed a GSM overlay of the RFB network in areas not otherwise covered by Dobson's previously-licensed spectrum, but this GSM network is operating through a different switch located in Grand Traverse, MI. Although the transition from CDMA to GSM/GPRS is proceeding, Dobson filed for waiver of the 20.18(g)(1)(v) of the Commission's rules on December 20, 2005 because not all of the legacy CDMA customers have ALI-compliant handsets. The waiver request remains pending.

C. Deployment Issues

DCS, as a rural carrier, has numerous markets that do not have the cell site density to provide accurate Phase II information via a network-based solution. DCS has recently employed a software-based solution from Polaris in the vast majority of its markets that DCS hopes will ultimately yield more reliable results in these difficult markets. However, regardless of vendor, DCS faces accuracy challenges due to cell site configuration problems, especially in markets with only one or two cell sites. As previously reported, DCS has learned from the vendor that in the Polaris-served markets E911 Phase II service will not be available to subscribers using analog service. DCS continues to review other alternatives to provide E911 Phase II to these subscribers.

For DCS's hardware-based solution, in order to meet the Commission's network-based accuracy requirements, Andrew Corporation may need to install Angle-of-Arrival ("AOA") antennas at certain cell sites in addition to the Time Difference of Arrival equipment that will be installed in individual cell sites. DCS has also been informed that installing AOA antennas may require tower modifications, lease modifications, and zoning approvals – any of which present the potential for delay.

DCS brought similar matters to the Commission's attention in its September 4, 2001 waiver request.⁵ Accordingly, if necessary, DCS may avail itself of further waiver procedures to

³ *Revision of the Commission's Rules to Ensure Compatibility with Enhanced E911 Emergency Calling Systems, Petition of City of Richardson*, CC Docket No. 94-102, *Order*, 16 FCC Rcd 18982, 18986-87 (2001).

⁴ In acquiring the RFB markets, DCS was not provided the specific dates of all previously received PSAP requests and, if applicable, E911 deployment dates. In the absence of having a specific date to insert into the report, DCS utilizes the placeholder date of 12/28/04 (the date DCS acquired the assets in RFB markets) to comply with formatting issues previously raised by the FCC staff.

⁵ See DCS Petition for Waiver of Sections 20.18(e), (f), and (h) of the Commission's Rules, CC Docket No. 94-102, at 11-15 (filed Sept. 4, 2001).

account for the potential market-specific shortcomings a network-based solution in its rural markets may present. The Commission has indicated that it will consider such requests.⁶

As required by the *Order to Stay*, a copy of this report is being filed with the Chief of the Enforcement Bureau, the Chief of the Wireless Telecommunications Bureau, and the Executive Directors and Counsels of APCO, NENA, and NANSAs.

⁶ See *Order to Stay*, 17 FCC Rcd at 14853.

| PSAP ID | PSAP Name | PSAP State | PSAP County | Implementation Phase | Air Interface | Date PSAP Request Made | Date PSAP Request Withdrawn | Invalid Request | Deployed | Date Deployed | Date Projected | Reasons | Comment |
|---------|--|------------|-------------------|----------------------|---------------|------------------------|-----------------------------|-----------------|----------|---------------|----------------|---------|--|
| 10 | Anchorage Police Department | AK | Anchorage Borough | 1 | TDMA/GSM | 04/28/2004 | | N | Y | 08/17/2005 | | | |
| 10 | Anchorage Police Department | AK | Anchorage Borough | 2 | TDMA/GSM | 04/28/2004 | | N | Y | 10/28/2005 | | | |
| 3429 | Kalkaska County Central Dispatch | MI | Kalkaska | 1 | TDMA/GSM | 04/30/2001 | | N | Y | 04/08/2002 | | | |
| 3429 | Kalkaska County Central Dispatch | MI | Kalkaska | 2 | TDMA/GSM | 10/01/2004 | | N | Y | 04/25/2005 | | | |
| 3459 | Mason-oceana 9-1-1-Mason | MI | Mason | 1 | GSM | 02/09/2001 | | N | Y | 08/19/2002 | | | |
| 3459 | Mason-Oceana 9-1-1-Mason | MI | Mason | 2 | GSM | 1/9/03 and 9/30/2003 | | N | Y | 04/19/2005 | | | |
| 3454 | Manistee County Central Dispatch | MI | Manistee | 1 | TDMA/GSM | 09/01/2000 | | N | Y | 03/19/2002 | | | |
| 3487 | Missaukee County Sheriffs Department | MI | Missaukee | 1 | TDMA/GSM | 09/01/2000 | | N | Y | 03/19/2002 | | | |
| 3487 | Missaukee County Sheriffs Department | MI | Missaukee | 2 | TDMA/GSM | 07/21/2005 | | N | Y | 09/15/2005 | | | |
| 3493 | Montmorency County Sheriffs Department | MI | Montmorency | 1 | GSM | 06/22/2005 | | N | Y | 10/28/2005 | | | Dobson acquired this license on June 22, 2005. However, the predecessor-in-interest did not provide a copy of the original PSAP request so the actual request date is unknown. |
| 3493 | Montmorency County Sheriffs Department | MI | Montmorency | 2 | GSM | 06/22/2005 | | N | Y | 10/28/2005 | | | |
| 3518 | Oscoda County Sheriffs Department | MI | Oscoda | 1 | GSM | 06/22/2005 | | N | Y | 12/14/2005 | | | Dobson acquired this license on June 22, 2005. However, the predecessor-in-interest did not provide a copy of the original PSAP request so the actual request date is unknown. |
| 3518 | Oscoda County Sheriffs Department | MI | Oscoda | 2 | GSM | 06/22/2005 | | N | Y | 12/14/2005 | | | Dobson acquired this license on June 22, 2005. However, the predecessor-in-interest did not provide a copy of the original PSAP request so the actual request date is unknown. |
| 3517 | Osceola County Sheriffs Office | MI | Osceola | 1 | TDMA/GSM | 09/01/2000 | | N | Y | 04/25/2002 | | | |
| 3517 | Osceola County Sheriffs Office | MI | Osceola | 2 | TDMA/GSM | 06/15/2004 | | N | Y | 04/19/2005 | | | |
| 3436 | Lake County 9-1-1 Central Dispatch | MI | Lake | 1 | TDMA/GSM | 09/01/2000 | | N | Y | 04/09/2002 | | | |
| 3436 | Lake County 9-1-1 Central Dispatch | MI | Lake | 2 | TDMA/GSM | 10/23/2003 | | N | Y | 04/19/2005 | | | |
| 3316 | Antrim County Central Dispatch | MI | Antrim | 1 | TDMA/GSM | 09/11/2001 | | Y | Y | 10/13/2003 | | | |
| 3316 | Antrim County Central Dispatch | MI | Antrim | 2 | TDMA/GSM | 12/20/2004 | | N | Y | 04/27/2005 | | | |
| 3344 | CCE Central Dispatch-Charlevoix | MI | Charlevoix | 1 | TDMA/GSM | 09/01/2000 | | N | Y | 04/08/2002 | | | |
| 3344 | CCE Central Dispatch-Charlevoix | MI | Charlevoix | 2 | TDMA/GSM | 12/3/2003 and 6/15/04 | | N | Y | 04/26/2005 | | | |
| 3442 | Leelanau County Sheriffs Department | MI | Leelanau | 1 | TDMA/GSM | 02/15/2001 | | N | Y | 03/18/2002 | | | |
| 3442 | Leelanau County Sheriffs Department | MI | Leelanau | 2 | TDMA/GSM | 1/29/2004 and 6/15/04 | | N | Y | 04/25/2005 | | | |
| 3587 | Wexford County Central Dispatch | MI | Wexford | 1 | TDMA/GSM | 09/01/2000 | | N | Y | 03/19/2002 | | | |
| 3587 | Wexford County Central Dispatch | MI | Wexford | 2 | TDMA/GSM | 06/10/2005 | | N | Y | 07/12/2005 | | | |
| 3346 | CCE Central Dispatch-Emmet | MI | Emmet | 1 | TDMA/GSM | 09/01/2000 | | N | Y | 04/09/2002 | | | |
| 3346 | CCE Central Dispatch-Emmet | MI | Emmet | 2 | TDMA/GSM | 12/3/2003 and 6/15/04 | | N | Y | 04/27/2005 | | | |
| 3330 | Benzie County Sheriffs Department | MI | Benzie | 1 | TDMA/GSM | 09/01/2000 | | N | Y | 04/09/2002 | | | |
| 3330 | Benzie County Sheriffs Department | MI | Benzie | 2 | TDMA/GSM | 03/17/2005 | | N | Y | 04/25/2005 | | | |
| 3396 | Grand Traverse County Central Dispatch | MI | Grand Traverse | 1 | TDMA/GSM | 09/01/2000 | | N | Y | 03/18/2002 | | | |
| 3396 | Grand Traverse County Central Dispatch | MI | Grand Traverse | 2 | TDMA/GSM | 06/06/2005 | | N | Y | 07/22/2005 | | | |
| 3415 | Huron County Central Dispatch | MI | Huron | 1 | TDMA/GSM | 09/01/2000 | | N | Y | 02/15/2002 | | | |
| 3415 | Huron County Central Dispatch | MI | Huron | 2 | TDMA/GSM | 01/07/2004 | | N | Y | 04/27/2005 | | | |
| 3550 | Sanilac County Central Dispatch | MI | Sanilac | 1 | TDMA/GSM | 09/01/2000 | | N | Y | 02/22/2002 | | | |
| 3550 | Sanilac County Central Dispatch | MI | Sanilac | 2 | TDMA/GSM | 11/03/2003 | | N | Y | 04/27/2005 | | | |
| 3572 | Tuscola County Central Dispatch | MI | Tuscola | 1 | TDMA/GSM | 09/01/2000 | | N | Y | 02/13/2002 | | | |
| 3572 | Tuscola County Central Dispatch | MI | Tuscola | 2 | TDMA/GSM | 01/07/2004 | | N | Y | 04/27/2005 | | | |
| 3345 | CCE Central Dispatch-Cheboygan | MI | Cheboygan | 1 | GSM | 09/01/2000 | | N | Y | 05/28/2004 | | | |
| 3345 | CCE Central Dispatch-Cheboygan | MI | Cheboygan | 2 | GSM | 12/03/2003 | | N | Y | 04/27/2005 | | | |
| 3308 | Alcona County Sheriffs Department | MI | Alcona | 2 | GSM | 11/01/2003 | | N | Y | 04/22/2005 | | | |
| 3317 | Arenac County Central Dispatch | MI | Arenac | 2 | GSM | 10/31/2003 | | N | Y | 08/08/2005 | | | |
| 3354 | Clare County Central Dispatch | MI | Clare | 2 | GSM | 03/03/2004 | | N | Y | 04/21/2005 | | | |
| 3361 | Crawford Emergency Central Dispatch | MI | Crawford | 2 | GSM | 10/23/2003 | | N | Y | 04/27/2005 | | | |
| 3420 | Iosco County 9-1-1 | MI | Iosco | 2 | GSM | 08/18/2003 | | N | Y | 04/22/2005 | | | |
| 3423 | Isabella County Central Dispatch | MI | Isabella | 2 | GSM | 04/21/2004 | | N | Y | 04/20/2005 | | | Although Dobson completed deployment of Phase II service, on July 8, 2005, Dobson reverted back to Phase I per PSAP request. |

| PSAP ID | PSAP Name | PSAP State | PSAP County | Implementation Phase | Air Interface | Date PSAP Request Made | Date PSAP Request Withdrawn | Invalid Request | Deployed | Date Deployed | Date Projected | Reasons | Comment |
|---------|---------------------------------------|------------|--------------|----------------------|---------------|------------------------|-----------------------------|-----------------|----------|---------------|----------------|---------|--|
| 3451 | Mackinac County Sheriffs Department | MI | Mackinac | 1 | GSM | 02/15/2001 | | N | Y | 02/02/2005 | | | |
| 3451 | Mackinac County Sheriffs Department | MI | Mackinac | 2 | GSM | 02/03/2004 | | N | Y | 04/27/2005 | | | |
| 3461 | Meceola Central Dispatch-Mecosta | MI | Mecosta | 2 | GSM | 04/01/2004 | | N | Y | 04/20/2005 | | | |
| 3542 | Roscommon County Central Dispatch | MI | Roscommon | 2 | GSM | 10/28/2003 | | N | Y | 04/21/2005 | | | Although Dobson has completed deployment of Phase II service, on July 29, 2005, Dobson reverted back to Phase I per PSAP request. |
| 3495 | Muskegon Central Dispatch | MI | Muskegon | 2 | GSM | 10/13/2004 | | N | Y | 04/20/2005 | | | |
| 3504 | Newaygo County 9-1-1 Central Dispatch | MI | Newaygo | 2 | GSM | 10/21/2003 | | N | Y | 04/19/2005 | | | |
| 3482 | Midland County Central Dispatch | MI | Midland | 1 | GSM | 08/16/2000 | | N | Y | 05/26/2005 | | | |
| 3482 | Midland County Central Dispatch | MI | Midland | 2 | GSM | 01/27/2004 | | N | Y | 06/15/2005 | | | |
| 3313 | Alpena County Central Dispatch | MI | Alpena | 1 | GSM | 11/16/2004 | | N | Y | 01/12/2005 | | | |
| 3313 | Alpena County Central Dispatch | MI | Alpena | 2 | GSM | 11/09/2004 | | N | Y | 04/26/2005 | | | |
| 3515 | Ogemaw County Sheriffs Department | MI | Ogemaw | 2 | GSM | 01/28/2004 | | N | Y | 09/15/2005 | | | |
| 3519 | Otsego County 9-1-1 | MI | Otsego | 2 | GSM | 11/21/2003 | | N | Y | 04/26/2005 | | | |
| 3492 | Montcalm County Central Dispatch | MI | Montcalm | 2 | GSM | 11/05/2004 | | N | Y | 04/20/2005 | | | |
| 3309 | Alger County Central Dispatch | MI | Alger | 1 | GSM | 01/25/2005 | | N | Y | 09/22/2005 | | | |
| 3309 | Alger County Central Dispatch | MI | Alger | 2 | GSM | 01/25/2005 | | N | Y | 09/22/2005 | | | |
| 3309 | Alger County Central Dispatch | MI | Alger | 2 | CDMA | 01/25/2005 | | N | Y | 07/28/2005 | | | |
| 3352 | Chippewa County Central Dispatch | MI | Chippewa | 1 | GSM | 12/28/2004 | | N | Y | 09/22/2005 | | | |
| 3352 | Chippewa County Central Dispatch | MI | Chippewa | 2 | GSM | 11/03/2003 | | N | Y | 09/22/2005 | | | |
| 3352 | Chippewa County Central Dispatch | MI | Chippewa | 2 | CDMA | 11/03/2003 | | N | Y | 09/16/2004 | | | |
| 3449 | Luce County Sheriffs Department | MI | Luce | 1 | GSM | 12/28/2004 | | N | Y | 09/23/2005 | | | |
| 3449 | Luce County Sheriffs Department | MI | Luce | 2 | GSM | 12/30/2003 | | N | Y | 09/23/2005 | | | |
| 3449 | Luce County Sheriffs Department | MI | Luce | 2 | CDMA | 12/30/2003 | | N | Y | 09/16/2004 | | | |
| 3365 | Delta County Central Dispatch | MI | Delta | 1 | GSM | 12/28/2004 | | N | Y | 09/22/2005 | | | |
| 3365 | Delta County Central Dispatch | MI | Delta | 2 | GSM | 01/20/2004 | | N | Y | 09/22/2005 | | | |
| 3365 | Delta County Central Dispatch | MI | Delta | 2 | CDMA | 01/20/2004 | | N | Y | 12/28/2004 | | | |
| 3552 | Schoolcraft County | MI | Schoolcraft | 1 | GSM | 12/28/2004 | | N | Y | 09/23/2005 | | | |
| 3365 | Schoolcraft County | MI | Schoolcraft | 2 | GSM | 12/28/2004 | | N | Y | 09/23/2005 | | | |
| 3365 | Schoolcraft County | MI | Schoolcraft | 2 | CDMA | 12/28/2004 | | N | Y | 12/28/2004 | | | |
| 3531 | Presque Isle Sheriffs Department | MI | Presque Isle | 2 | GSM | 06/14/2005 | | N | Y | 08/01/2005 | | | |
| 3397 | Gratiot County Central Dispatch | MI | Gratiot | 2 | GSM | 10/14/2005 | | N | Y | 01/12/2006 | | | |
| 3763 | Caldwell County Sheriffs Office | MO | Caldwell | 1 | TDMA/GSM | 07/23/2003 | | N | Y | 10/13/2004 | | | |
| 3763 | Caldwell County Sheriffs Office | MO | Caldwell | 2 | TDMA/GSM | 10/25/2004 | | N | Y | 01/23/2006 | | | Dobson has completed installation of the necessary software and hardware of the network-based E911 Phase II solution. Through its third-party vendor Intrado, Dobson has tested to demonstrate to the PSAP that latitude and longitude information is being transmitted in the appropriate format. The PSAP's CPE equipment initially did not function properly, but the PSAP fixed the problem allowing Dobson and the PSAP to finalize. However, due to the isolation of some of the cell sites from other neighboring sites, the Phase II solution continues to experience technical difficulties, and the network sometimes reverts back to Phase I when a call is made. |
| 3785 | Clinton County Sheriffs Office | MO | Clinton | 1 | TDMA/GSM | 07/23/2003 | | N | Y | 10/13/2004 | | | |
| 3785 | Clinton County Sheriffs Office | MO | Clinton | 2 | TDMA/GSM | 10/25/2004 | | N | Y | 09/19/2005 | | | |
| 3795 | De Kalb County Sheriffs Office | MO | De Kalb | 1 | TDMA/GSM | 07/23/2003 | | N | Y | 10/13/2004 | | | |
| 3795 | De Kalb County Sheriffs Office | MO | De Kalb | 2 | TDMA/GSM | 10/25/2004 | | N | Y | 09/19/2005 | | | |
| 3860 | Maryville Police Department | MO | Nodaway | 1 | TDMA/GSM | 08/27/2003 | | N | Y | 08/23/2004 | | | |
| 3860 | Maryville Police Department | MO | Nodaway | 2 | TDMA/GSM | 07/20/2005 | | N | Y | 03/28/2006 | | | |
| 3879 | Nodaway County Sheriffs Department | MO | Nodaway | 1 | TDMA/GSM | 01/21/2004 | | N | Y | 08/23/2004 | | | |
| 3879 | Nodaway County Sheriffs Department | MO | Nodaway | 2 | TDMA/GSM | 07/20/2005 | | N | Y | 09/26/2005 | | | |
| 3769 | Carroll County Sheriffs Office | MO | Carroll | 1 | TDMA/GSM | 07/29/2004 | | N | Y | 07/15/2005 | | | |
| 3769 | Carroll County Sheriffs Office | MO | Carroll | 2 | TDMA/GSM | 07/29/2004 | | N | Y | 09/26/2005 | | | |

| PSAP ID | PSAP Name | PSAP State | PSAP County | Implementation Phase | Air Interface | Date PSAP Request Made | Date PSAP Request Withdrawn | Invalid Request | Deployed | Date Deployed | Date Projected | Reasons | Comment |
|---------|---------------------------------------|------------|---------------|----------------------|---------------|------------------------|-----------------------------|-----------------|----------|---------------|----------------|---------|--|
| 3811 | Gentry County 9-1-1 | MO | Gentry | 1 | TDMA/GSM | 04/04/2005 | | N | Y | 04/27/2006 | | | Dobson has not received the necessary LEC facilities and will install the circuits and turn on Phase I once they arrive. The PSAP has been informed in writing of these LEC issues. LEC facilities delivered on 04/27/06 and installed on same date. |
| 3811 | Gentry County 9-1-1 | MO | Gentry | 2 | TDMA/GSM | 02/02/2006 | | N | N | | 08/02/2006 | | |
| 3742 | Atchison County 9-1-1 | MO | Atchison | 1 | TDMA/GSM | 06/14/2005 | | N | Y | 10/27/2005 | | | |
| 2707 | Brown County Sheriffs Office | KS | Brown | 1 | TDMA/GSM | 03/30/2005 | | N | Y | 01/26/2006 | | | |
| 6423 | Bastrop County Sheriffs Office | TX | Bastrop | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 03/18/2001 | | | |
| 6467 | Caldwell County Sheriffs Office | TX | Caldwell | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 03/18/2001 | | | |
| 6578 | Fayette County Sheriffs Office | TX | Fayette | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 03/18/2001 | | | |
| 6725 | Lee County Sheriffs Office | TX | Lee | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 01/15/2001 | | | |
| 6612 | Gonzales County Sheriffs Office | TX | Gonzales | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 01/15/2001 | | | |
| 6674 | Jackson County Sheriffs Office | TX | Jackson | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 01/15/2001 | | | |
| 6722 | Lavaca County Sheriffs Office | TX | Lavaca | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 01/15/2001 | | | |
| 6865 | Rockdale Police Department | TX | Milam | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 02/13/2001 | | | |
| 6627 | Hamilton County Sheriffs Office | TX | Hamilton | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 02/13/2001 | | | |
| 6575 | Falls County Sheriffs Office | TX | Falls | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 02/28/2001 | | | |
| 6587 | Freestone Sheriffs Office | TX | Freestone | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 02/28/2001 | | | |
| 6733 | Limestone Sheriffs Office | TX | Limestone | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 02/28/2001 | | | |
| 6446 | Bosque County Sheriffs Office | TX | Bosque | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 02/28/2001 | | | |
| 6649 | Hill County Sheriffs Office | TX | Hill | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 02/28/2001 | | | |
| 6498 | Colorado County Sheriffs Office | TX | Colorado | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 02/21/2001 | | | |
| 6592 | Ft Bend County Sheriffs Office | TX | Fort Bend | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 02/21/2001 | | | |
| 6757 | Matagorda County Sheriffs Office | TX | Matagorda | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 02/21/2001 | | | |
| 6993 | Wharton County Sheriffs Office | TX | Wharton | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 02/21/2001 | | | |
| 6796 | Navarro County Sheriffs Department | TX | Navarro | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 04/15/2001 | | | |
| 6796 | Navarro County Sheriffs Department | TX | Navarro | 2 | TDMA/GSM | 3/9/2005 | | N | Y | 09/14/2005 | | | |
| 6572 | Erath County Sheriffs Office | TX | Erath | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 04/15/2001 | | | |
| 6572 | Erath County Sheriffs Office | TX | Erath | 2 | TDMA/GSM | 3/9/2005 | | N | Y | 09/21/2005 | | | |
| 6411 | Armstrong County Sheriffs Office | TX | Armstrong | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 02/23/2001 | | | |
| 6476 | Carson County Sheriffs Office | TX | Carson | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 02/23/2001 | | | |
| 6496 | Collingsworth County Sheriffs Office | TX | Collingsworth | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 02/23/2001 | | | |
| 6547 | Donley County Sheriffs Office | TX | Donley | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 02/23/2001 | | | |
| 6817 | Pampa Police Department | TX | Gray | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 02/23/2001 | | | |
| 6628 | Hansford County Sheriffs Office | TX | Hansford | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 02/23/2001 | | | |
| 6640 | Hemphill County Sheriffs Office | TX | Hemphill | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 02/23/2001 | | | |
| 6445 | Borger Police Department | TX | Hutchinson | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 02/23/2001 | | | |
| 6735 | Lipscomb County Sheriffs Office | TX | Lipscomb | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 02/23/2001 | | | |
| 6827 | Perryton Police Department | TX | Ochiltree | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 02/23/2001 | | | |
| 6861 | Roberts County Sheriffs Office | TX | Roberts | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 02/23/2001 | | | |
| 6995 | Wheeler County Sheriffs Office | TX | Wheeler | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 02/23/2001 | | | |
| 6862 | Robertson County Sheriff | TX | Robertson | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 04/15/2001 | | | |
| 6464 | Burleson County Sheriffs Office | TX | Burleson | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 04/15/2001 | | | |
| 6726 | Leon Sheriffs Office | TX | Leon | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 04/15/2001 | | | |
| 6978 | Washington County Sheriffs Department | TX | Washington | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 04/15/2001 | | | |
| 6402 | Anderson Sheriffs Office | TX | Anderson | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 01/10/2003 | | | |
| 6966 | Van Zandt Sheriffs Office | TX | Van Zandt | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 01/10/2003 | | | |
| 6492 | Coleman Police Department | TX | Coleman | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 03/08/2001 | | | |
| 6462 | Brownwood Police Department | TX | Brownwood | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 03/08/2001 | | | |
| 6500 | Comanche County Sheriffs Office | TX | Comanche | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 03/08/2001 | | | |
| 6873 | Runnels County Sheriffs Office | TX | Runnels | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 03/08/2001 | | | |
| 6555 | Eastland County Central Dispatch | TX | Eastland | 1 | TDMA/GSM | 10/12/1999 | | N | Y | 02/21/2001 | | | |
| 6415 | Austin County Sheriffs Department | TX | Austin | 1 | TDMA/GSM | 01/14/2002 | | N | Y | 03/13/2003 | | | |
| 6415 | Austin County Sheriffs Department | TX | Austin | 2 | TDMA/GSM | 01/28/2003 | | N | Y | 01/27/2005 | | | Dobson continues to work with the PSAP to deploy additional sites and improve accuracy. |
| 6641 | Henderson County Sheriffs Department | TX | Henderson | 1 | TDMA/GSM | 01/09/2003 | | N | Y | 08/13/2003 | | | |
| 6641 | Henderson County Sheriffs Department | TX | Henderson | 2 | TDMA/GSM | 07/29/2003 | | N | Y | 12/10/2004 | | | |
| 6911 | Somervell County Sheriffs Department | TX | Somervell | 2 | TDMA/GSM | 03/09/2005 | | N | Y | 09/21/2005 | | | |
| 3205 | Allegany County Emergency Services | MD | Allegany | 1 | TDMA | 11/21/2003 | | N | Y | 09/22/2004 | | | |
| 3205 | Allegany County Emergency Services | MD | Allegany | 1 | GSM | 11/21/2003 | | N | Y | 06/21/2005 | | | |
| 3205 | Allegany County Emergency Services | MD | Allegany | 2 | TDMA/GSM | 10/18/2004 | | N | Y | 07/26/2005 | | | |
| 3236 | Washington County Fire Rescue and Com | MD | Washington | 1 | TDMA/GSM | 01/30/2004 | | N | Y | 01/11/2005 | | | |

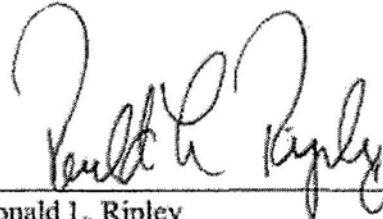
| PSAP ID | PSAP Name | PSAP State | PSAP County | Implementation Phase | Air Interface | Date PSAP Request Made | Date PSAP Request Withdrawn | Invalid Request | Deployed | Date Deployed | Date Projected | Reasons | Comment |
|---------|--|------------|-------------|----------------------|---------------|------------------------|-----------------------------|-----------------|----------|---------------|----------------|---------|--|
| 3236 | Washington County Fire Rescue and Comm | MD | Washington | 2 | TDMA/GSM | 02/07/2005 | | N | Y | 07/13/2005 | | | |
| 3223 | Garrett County Fire and Rescue Commun | MD | Garrett | 1 | TDMA/GSM | 05/05/2004 | | N | Y | 01/18/2005 | | | |
| 3223 | Garrett County Fire and Rescue Commun | MD | Garrett | 2 | TDMA/GSM | 01/21/2005 | | N | Y | 06/29/2005 | | | |
| 3220 | Frederick County Emergency Communicat | MD | Frederick | 1 | TDMA/GSM | 06/03/2004 | | N | Y | 10/20/2005 | | | |
| 3220 | Frederick County Emergency Communicat | MD | Frederick | 2 | TDMA/GSM | 06/15/2004 | | N | Y | 10/20/2005 | | | |
| 5887 | Erie County 9-1-1 Center | PA | Erie | 1 | TDMA/GSM | 04/12/2001 | | N | Y | 02/06/2002 | | | |
| 5887 | Erie County 9-1-1 Center | PA | Erie | 2 | TDMA | 04/12/2001 | | N | Y | 10/30/2003 | | | |
| 5887 | Erie County 9-1-1 Center | PA | Erie | 2 | GSM | 04/12/2001 | | N | Y | 09/07/2005 | | | |
| 5878 | Crawford County Office of Emergency Serv | PA | Crawford | 1 | TDMA/GSM | 03/26/2002 | | N | Y | 02/19/2003 | | | |
| 5893 | Greene County 9-1-1 | PA | Greene | 1 | TDMA/GSM | 03/04/2006 | | N | N | | 09/04/2006 | | |
| 5863 | Cameron County Emergency Management | PA | Cameron | 1 | TDMA/GSM | 03/20/2006 | | N | N | | 09/20/2006 | | |
| 5863 | Cameron County Emergency Management | PA | Cameron | 2 | TDMA/GSM | 03/27/2006 | | N | N | | 09/27/2006 | | |
| 5031 | Allegany County Sheriffs Office | NY | Allegany | 1 | TDMA/GSM | 07/18/2002 | | N | Y | 03/26/2003 | | | |
| 5031 | Allegany County Sheriffs Office | NY | Allegany | 2 | TDMA | 06/13/2003 | | N | Y | 04/01/2004 | | | |
| 5031 | Allegany County Sheriffs Office | NY | Allegany | 2 | GSM | 06/13/2003 | | N | Y | 05/25/2005 | | | |
| 5048 | Cattaraugus County Sheriffs Office | NY | Cattaraugus | 1 | TDMA/GSM | 05/22/2001 | | N | Y | 08/06/2002 | | | |
| 5048 | Cattaraugus County Sheriffs Office | NY | Cattaraugus | 2 | TDMA | 06/05/2002 | | N | Y | 04/15/2004 | | | |
| 5048 | Cattaraugus County Sheriffs Office | NY | Cattaraugus | 2 | GSM | 06/05/2002 | | N | Y | 05/13/2005 | | | |
| 5051 | Chautauqua County Sheriffs Office | NY | Chautauqua | 1 | TDMA/GSM | 06/01/2001 | | N | Y | 05/17/2002 | | | |
| 5051 | Chautauqua County Sheriffs Office | NY | Chautauqua | 2 | TDMA | 12/13/2002 | | N | Y | 04/20/2004 | | | |
| 5051 | Chautauqua County Sheriffs Office | NY | Chautauqua | 2 | GSM | 12/13/2002 | | N | Y | 05/12/2005 | | | |
| 5084 | Genesee County Sheriffs Office | NY | Genesee | 1 | TDMA/GSM | 04/10/2001 | | N | Y | 11/21/2002 | | | |
| 5084 | Genesee County Sheriffs Office | NY | Genesee | 2 | TDMA | 09/09/2002 | | N | Y | 11/13/2003 | | | |
| 5084 | Genesee County Sheriffs Office | NY | Genesee | 2 | GSM | 09/09/2002 | | N | Y | 05/25/2005 | | | |
| 5208 | Steuben County Sheriffs Office | NY | Steuben | 1 | TDMA/GSM | 11/03/2004 | | N | Y | 10/26/2005 | | | |
| 5208 | Steuben County Sheriffs Office | NY | Steuben | 2 | TDMA/GSM | 11/03/2004 | | N | Y | 10/26/2005 | | | |
| 5230 | Wyoming County Sheriffs Office | NY | Wyoming | 2 | TDMA/GSM | 03/31/2006 | | N | N | | 09/30/2006 | | |
| 5644 | Grady County Sheriffs Department | OK | Grady | 1 | TDMA/GSM | 9/15/2004 | | N | Y | 3/10/2005 | | | |
| 5644 | Grady County Sheriffs Department | OK | Grady | 2 | TDMA/GSM | 3/10/2005 | | N | Y | 8/18/2005 | | | |
| 5728 | Seminole Police Department | OK | Seminole | 1 | TDMA/GSM | 2/20/2006 | | N | N | | 08/20/2006 | | |
| 5728 | Seminole Police Department | OK | Seminole | 2 | TDMA/GSM | 2/20/2006 | | N | N | | 08/20/2006 | | |
| 5590 | Beckham County Sheriffs Office | OK | Beckham | 1 | TDMA/GSM | 3/1/2006 | | N | N | | 09/01/2006 | | PSAP has notified Dobson that it is suspending work on Phase I and Phase II deployment until June 1, 2006. |
| 5590 | Beckham County Sheriffs Office | OK | Beckham | 2 | TDMA/GSM | 3/1/2006 | | N | N | | 09/01/2006 | | See Beckham County (PSAP ID 5590), Phase I. |
| 5612 | City of Clinton Police Department | OK | Custer | 1 | TDMA/GSM | 3/1/2006 | | N | N | | 09/01/2006 | | See Beckham County (PSAP ID 5590), Phase I. |
| 5612 | City of Clinton Police Department | OK | Custer | 2 | TDMA/GSM | 3/1/2006 | | N | N | | 09/01/2006 | | See Beckham County (PSAP ID 5590), Phase I. |
| 5744 | Weatherford Police Department | OK | Custer | 1 | TDMA/GSM | 3/1/2006 | | N | N | | 09/01/2006 | | See Beckham County (PSAP ID 5590), Phase I. |
| 5744 | Weatherford Police Department | OK | Custer | 2 | TDMA/GSM | 3/1/2006 | | N | N | | 09/01/2006 | | See Beckham County (PSAP ID 5590), Phase I. |
| 5653 | Hobart Police Department | OK | Kiowa | 1 | TDMA/GSM | 3/1/2006 | | N | N | | 09/01/2006 | | See Beckham County (PSAP ID 5590), Phase I. |
| 5653 | Hobart Police Department | OK | Kiowa | 2 | TDMA/GSM | 3/1/2006 | | N | N | | 09/01/2006 | | See Beckham County (PSAP ID 5590), Phase I. |
| 5666 | Kiowa County Sheriffs Department | OK | Kiowa | 1 | TDMA/GSM | 3/1/2006 | | N | N | | 09/01/2006 | | See Beckham County (PSAP ID 5590), Phase I. |
| 5666 | Kiowa County Sheriffs Department | OK | Kiowa | 2 | TDMA/GSM | 3/1/2006 | | N | N | | 09/01/2006 | | See Beckham County (PSAP ID 5590), Phase I. |
| 5721 | Roger Mills County Sheriffs Department | OK | Roger Mills | 1 | TDMA/GSM | 3/1/2006 | | N | N | | 09/01/2006 | | See Beckham County (PSAP ID 5590), Phase I. |
| 5721 | Roger Mills County Sheriffs Department | OK | Roger Mills | 2 | TDMA/GSM | 3/1/2006 | | N | N | | 09/01/2006 | | See Beckham County (PSAP ID 5590), Phase I. |
| 5608 | Chickasha Police Department | OK | Grady | 1 | TDMA/GSM | 3/9/2006 | | N | N | | 09/09/2006 | | |
| 5608 | Chickasha Police Department | OK | Grady | 2 | TDMA/GSM | 3/9/2006 | | N | N | | 09/09/2006 | | |
| 5704 | Ottawa County 9-1-1 | OK | Ottawa | 1 | TDMA/GSM | 3/1/2006 | | N | N | | 09/01/2006 | | |
| 5704 | Ottawa County 9-1-1 | OK | Ottawa | 2 | TDMA/GSM | 3/1/2006 | | N | N | | 09/01/2006 | | |
| 5527 | Trumbull County Dispatch | OH | Trumbull | 1 | TDMA/GSM | 4/24/2006 | | N | N | | 10/24/2006 | | |

AFFIDAVIT OF RONALD L. RIPLEY

I, Ronald L. Ripley, do hereby declare that the following is true and accurate:

I am an officer of Dobson Cellular Systems, Inc. ("DCS").

I have reviewed the DCS E911 Quarterly Report ("Report") and to the best of my knowledge, information, or belief, all of the information contained in the Report is truthful and accurate.

A handwritten signature in cursive script, appearing to read "Ronald L. Ripley", written over a horizontal line.

Ronald L. Ripley
Senior Vice President & General Counsel

Executed on: April 28, 2006

CERTIFICATE OF SERVICE

I, LaVon E. Nickens, hereby certify that on the 1st day of May 2006, copies of the foregoing "E911 Quarterly Report" have been served by first class mail, postage prepaid to the following:

Kris Monteith*
Bureau Chief
Enforcement Bureau
Federal Communications Commission
445 12th Street, S.W., Room 7C-485
Washington, D.C. 20554

Tim Ryan
Acting Executive Director, APCO
APCO International, Inc.
World Headquarters
351 N. Williamson Blvd.
Daytona Beach, FL 32114

Rob Martin
Executive Director
National Emergency Number Association
4350 North Fairfax Drive
Suite 750
Arlington, VA 22203

Catherine W. Seidel*
Acting Bureau Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Steve Marzolf
President, NASNA
VITA/Divs. Public Safety Cmn.
110 S. 7th St., Su. 100
Richmond, VA 23219-3931

James R. Hobson
Counsel for NENA and NASNA
Miller & Van Eaton
1155 Connecticut Avenue, N.W.
Washington, D.C. 20036

/s/ LaVon E. Nickens
LaVon E. Nickens

* *via hand delivery*